

Atlantic Richfield Company

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August 26, 2002

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333 W. Nye Lane
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Subject: Draft Final Community Relations Plan and Response to Comments on the Draft Community Relations Plan dated June 13, 2002

Please find enclosed, the Draft Final Community Relations Plan and Response to Comments on the Draft Community Relations Plan June 13, 2002. Atlantic Richfield Company appreciates this opportunity to respond to the comments provided by the regulatory agencies on July 23, 2002 for the subject Plan. The following responses are also based on the Yerington Technical Work Group (YTWG) meetings held on July 16 and August 22, 2002.

General Comments

General Comment no. 1: The intent of developing a good relationship with the community is to provide an opportunity for community members to provide input into the process, as well as to keep the public informed. Much of the draft Community Relations Plan (CRP) focuses on providing information to the community not on encouraging the community to provide their input.

Response to General Comment no. 1: Atlantic Richfield agrees that a good CRP will provide an opportunity for community members to provide input into the process, as well as being kept informed. The first draft issue of the Yerington Mine Site Update newsletter with the suggested revisions and method of getting it out to the public via insertion into the Mason Valley News will, when it is deemed final, accomplish both objectives. The revised CRP will address methods to encourage the community to provide their input.

General Comment no. 2: All fact sheets, newsletters, press releases, meeting agendas, and meeting minutes should be posted on a NDEP website which will be developed and maintained by NDEP personnel.

Response to General Comment no. 2: As of the date of this response letter and Draft Final CRP, the NDEP website has been created and includes CRP and YTWG outputs (sheets, newsletters, press releases, meeting agendas, meeting minutes, etc.).

Specific Comments

Specific Comment no. 1: Page 1; Please provide a Site overview, including a description of the problem. General description of what's been done and what may be done. Also, include an overview of the Yerington area and other areas possibly affected including who lives here, other local information, past mining information, etc.

Response to Specific Comment no. 1: Page 1; The CRP, as conceived by Atlantic Richfield, is a description of the objectives for the CRP and methods available to accomplish these objectives. As such, detailed information about the site, local information, past mining information and a problem description do not necessarily belong in the CRP. This type of information is better suited for CRP outputs such as a newsletter, website, fact sheets, etc. However, we will include a brief site description in the CRP. Based on the results of the August 22, 2002 YTWG meeting, a description of the "site problem" is currently being formulated and will be included in the first edition of the Yerington Mine Update newsletter and, potentially, on the NDEP web site. In lieu of this, we have included paraphrased text from the Closure Scope of Work to describe the site and closure issues.

Specific Comment no. 2: Page 1, Agencies with Oversight Responsibilities; The following sentence should be modified or deleted: "The MOU designates the NDEP as the lead regulatory agency for site closure activities". The MOU designates NDEP as the lead coordinating agency not as the lead regulatory agency for the Site investigation, cleanup and closure activities. At this time negotiations are underway between BLM and NDEP regarding which agency/agencies will have an enforcement lead over the Site.

Response to Specific Comment no. 2: Page 1, This information has been deleted from the Final Draft CRP.

Specific Comment no. 3: Page 1; EPA and BLM should also be listed as contacts. Please list Vicki Rosen as the EPA contact (415-972-3244).

Response to Specific Comment no. 3: In the attached Final Draft CRP, Vicki Rosen is listed as the EPA contact (415-972-3244) and Chuck Pope is listed as the BLM contact (775-885-6000).

Specific Comment no. 4: Page 2, Community Input into Plan; It is necessary to describe what community input has been received. The text does not include any reference to community concerns, desires, etc. Generally community interviews are used to develop this section. As discussed at the June 13th Technical Workgroup Meeting, many of the community members who would be candidates for interviews already attend the quarterly Stakeholder and/or monthly Technical Workgroup meetings. A sample list of questions is included as an attachment. The text should summarize some of these concerns as have been expressed at meetings. Other interviews, with community members who do not attend the regularly scheduled meetings, should be completed to supplement this section.

Response to Specific Comment no. 4: At present, input from the community has been received through past public meetings, public representatives' participation in the Yerington Stakeholder's Group and the YTWG meetings. As stated above, the CRP is a guideline, not the tool, for receiving input from the community. Interviews, if mutually agreed upon by all stakeholders, can be implemented. Text has been added to the CRP to allow such initiatives.

Specific Comment no. 5: Page 3, Newsletters; Add a summary of the stakeholder review process for the newsletter. For example, possibly plan for a ten to fourteen day review cycle.

Response to Specific Comment no. 5: Atlantic Richfield will add a summary of the stakeholder review process for the newsletter with a fourteen-day review cycle, or longer if the review process would require more time.

Specific Comment no. 6: Page 3, Public Meetings; Include some possible locations for meetings. Generally this would be based on input from community interviews.

Response to Specific Comment no. 6: Text has been added to indicate some possible locations for public meetings.

Specific Comment no. 7: Page 3, Mailing List; EPA will provide a copy of their mailing list after asking permission from list members.

Response to Specific Comment no. 7: Comment noted.

Specific Comment no. 8: Page 4, Information Repositories; Include more detail regarding the maintenance of the repository as well as those responsible for this activity.

Mr. Arthur G. Gravenstein
Nevada Division of Environmental Protection
August 26, 2002
Page 4

Please also provide addresses for the BLM and EPA offices where the community can also review the files.

Response to Specific Comment no. 8: The following text has been added:

“Information repositories have been established to provide public access to the technical reports and other information about the site investigation and remediation. Most or all site information will be available at the NDEP web site <http://ndep.state.nv.us/yerington/minesite.htm>. Hard copies of all documents will be available at the following locations:

Carson City, NV

NDEP

333 West Nye Lane, Room 138

Carson City, NV 89706

Phone: 775-687-9376

Fax: 775-687-6396

Yerington, NV

Lyon County Library

20 Nevin Way

Yerington, NV 89447

Phone: 775-463-6645

Fax: 775-463-6646

If you have any questions regarding the revised document or the responses to comments, please contact me at 1-406-563-5211 ext. 430.

Sincerely,

Dave McCarthy
Project Manager

DRAFT FINAL COMMUNITY RELATIONS PLAN for the YERINGTON MINE SITE, LYON COUNTY, NEVADA

August 26, 2002

1.0 INTRODUCTION

The Yerington Technical Work Group (YTWG) and the Yerington Stakeholders Group consists of the Atlantic Richfield Company, the Nevada Division of Environmental Protection (NDEP), the U.S. Bureau of Land Management (BLM), the U.S. Environmental Protection Agency (EPA), the U.S. Fish and Wildlife Service (FWS), the U.S. Bureau of Indian Affairs (BIA), the Yerington Paiute Indian Tribe, the Walker River Paiute Indian Tribe, Lyon County, the City of Yerington, and the office of U.S. Senator Harry Reid. Additional members of the local communities around the Yerington Mine site, and the public-at-large may also participate in the Yerington Stakeholders Group. The YTWG has prepared this draft Community Relations Plan (CRP) as part of the Closure Scope of Work in support of achieving closure of the Yerington Mine Site per applicable State and Federal regulations. This draft CRP describes the purpose, objectives and activities proposed to keep the public informed of the various project components and to communicate the progress at the site. This plan is consistent with EPA guidelines on public participation.

1.1 Summary and Description

The Yerington Mine site is located approximately one mile west of the town of Yerington in Lyon County, Nevada. Copper mining and ore beneficiation operations at a mill and precipitation plant were conducted between 1953 and 1978 for oxide and sulfide ores. Waste rock was deposited south and north of the open pit. Oxide and sulfide tailings were deposited north of the process areas. Evaporation ponds and solution collection ditches were also constructed at the site to manage process solutions. In 1989, Arimetco International acquired the site, and constructed heap leach pads and beneficiation circuits to processing copper ores. Arimetco has declared bankruptcy and abandoned the site in 2000.

The approximate 3,000-acre mine site is now inactive with the exception of fluid management of heap solutions, and general care and maintenance activities, being conducted by the NDEP. Atlantic Richfield is currently operating a groundwater pumpback and evaporation system. The YTWG has developed a Closure Scope of Work to achieve the following objectives: containment and management of existing and potential future impacts to groundwater; assessment and, if required, containment of fugitive dust; demonstrate the physical and chemical stability of all surface mine materials; demonstrate that mine closure units and potentially affected off-site areas following closure and reclamation activities will not adversely affect human health or the environment; and establish a compatible post-closure land use and related monitoring and maintenance plan.

1.2 Purpose of this Plan

This CRP will serve as the framework to ensure a successful information exchange with the public during site investigation and mine closure activities. It describes planned public involvement activities for the site, and it assigns responsibilities for implementing the communications strategy. The CRP identifies community relations tools (e.g., web site, newsletter, public meetings, interviews) that will encourage meaningful two-way dialogue between the YTWG, community stakeholders and the public-at-large.

Draft Final Community Relations Plan for the Yerington Mine Site, Lyon County, Nevada

1.3 Agencies with Oversight Responsibilities

The YTWG currently reviews all site investigation and mine closure activities at the mine site. An existing Memorandum of Understanding (MOU), dated March 28, 2002, between the NDEP, BLM and EPA describes the review and approval procedures by these regulatory agencies for site investigation and mine closure activities at the mine site.

1.4 Contact Information

The points-of-contact responsible for the public participation process during the site investigation and mine closure activities at the site is:

<u>Primary point-of-contact</u>	<u>Secondary points-of-contact</u>
Art Gravenstein, Staff Engineer Bureau of Corrective Actions NDEP 333 West Nye Lane Carson City, NV 89706 Phone: 775-687-9376 Fax: 775-687-6396 E-mail: agravenstein@ndep.state.nv.us	Vicki Rosen EPA Phone: 415-972-3244 Chuck Pope BLM Phone: 775-885-6000

1.5 Community Input into Plan

The CRP is based on input from the YTWG, the Yerington Stakeholder Group, community leaders, elected officials, and local landowners. Additionally, public meetings have previously been held to discuss site conditions and activities, and to receive input from the community. This plan will be updated, as needed, to reflect evolving community relations needs.

1.6 Organization of the Community Relations Plan

This plan consists of four sections.

- Section 1.0, Introduction - Provides an introduction and summary of the CRP.
- Section 2.0, Objectives - Describes the specific objectives of the CRP.
- Section 3.0, Public Involvement Activities - Describes the activities designed to promote public involvement throughout the site investigation and mine closure periods.

2.0 OBJECTIVES

This section lists the following specific objectives of the CRP:

Draft Final Community Relations Plan for the Yerington Mine Site, Lyon County, Nevada

- Maintain open communication between the YTWG, Yerington Stakeholders Group, the communities located near the mine site, and other interested individuals and groups.
- Establish a CRP with the flexibility to continually identify community concerns and to respond appropriately. As needed, the plan will be updated to ensure effective communication with the community.
- Encourage meaningful community involvement and two-way dialogue by providing regulatory agencies, community leaders, elected officials, local landowners, and tribal members with accurate, timely information about site investigation and mine closure activities, as well as other important technical and administrative matters.
- Inform the public of the conditions at the site and ongoing activities. This will be accomplished by distributing newsletters and fact sheets, conducting public meetings, and establishing information repositories.
- Encourage dialogue with, and input from, the public by promoting easily accessible points-of-contact for questions and comments.
- Monitor community concerns to ensure that communications meet the needs of the public.

3.0 COMMUNITY RELATIONS ACTIVITIES

This section describes community relations involvement activities that are intended to meet the objectives described in Section 2.0. Activities include ongoing communication with community leaders, elected officials, government agencies, Tribes, and local landowners.

3.1 Newsletters

A periodic newsletter will be prepared and distributed to interested parties via insertion into the Mason Valley News. The newsletter is anticipated to be prepared on a semi-annual basis, typically before and after the field season. This proposed schedule may be modified as needed. The newsletter will contain the following types of information:

- Descriptions of progress at the site;
- Descriptions of completed and upcoming technical activities;
- The status of any ongoing agency interactions;
- A section that addresses issues raised by the community; and,
- The schedule for upcoming YTWG and Stakeholder meetings.

Approximately 14 days are designated as the review period for regulatory agencies, and members of the Yerington Stakeholders Group and YTWG, to provide comments to the proposed contents of each newsletter. The audience for this publication will be the general public, so technical terminology will be explained in readily understandable terms. These newsletters will be distributed primarily through a mailing list described further in Section 3.4, but will also be available at various locations throughout the community as well as at the public meetings.

Draft Final Community Relations Plan for the Yerington Mine Site, Lyon County, Nevada

3.2 WebSite

NDEP has established a web site at <http://ndep.state.nv.us/yerington/minesite.htm> to provide current information about the technical work group, site closure and related activities. The web page currently contains meeting agendas and minutes, closure-related work products and regulatory comments, other formal correspondence, a 2001 aerial photograph and a brief history of the mine site. As more information becomes available, additional topics will be presented.

3.3 Fact Sheets

To answer specific questions and to support the sharing of information, fact sheets will be prepared to inform and update the public about site investigation and mine closure remediation activities. These brief, one-page publications will explain technical information to the general public in easy-to-read terminology to facilitate understanding by non-technical readers. These fact sheets will be available at the public meetings.

3.4 Public Meetings

The NDEP will host public meetings to make available current information about site activities, to answer questions, and to respond to specific community concerns, issues, or events. Public meetings will be held on an annual basis, but also may be required when activities necessitate further public involvement. Public meetings will be announced in the newsletters and through published notices in local newspapers. Possible locations identified for public meetings include the Lyon County building in Yerington, and at the Yerington Paiute Indian Tribe gymnasium.

The designated point-of-contact will be responsible for obtaining answers to questions and following through on commitments made to the community during the meetings. At the meetings, fact sheets and copies of newsletters will be available for distribution. A sign-up list will be included to identify attendees (and particularly attendees who want to be added to the mailing list). The proposed meeting location will be in the City of Yerington. The first meeting is planned sometime between November 2002 and March 2003.

3.5 Mailing List

A mailing list of interested local residents, members of the Tribe and tribal representatives, state and federal regulatory agencies, government officials, and news media will be compiled. The list will be updated, as needed, to ensure that interested parties are receiving the newsletter and notices of public meetings (as announced in the newsletter).

3.6 Interviews

If deemed necessary, interviews may be conducted with citizens and community leaders to gain insight into the public's perception of site conditions and site closure activities. Interviews may be held in conjunction with stakeholders' or public meetings, or may be arranged on an individual basis.

3.7 Information Repositories

Information repositories have been established to provide public access to the technical reports and other information about the site investigation and remediation. Most or all site information will be available at the

**Draft Final Community Relations Plan for the
Yerington Mine Site, Lyon County, Nevada**

NDEP web site <http://ndep.state.nv.us/yerington/minesite.htm>. Hard copies of all documents will be available at the following locations:

Carson City, NV

NDEP
333 West Nye Lane, Room 138
Carson City, NV 89706
Phone: 775-687-9376
Fax: 775-687-6396

Yerington, NV

Lyon County Library
20 Nevin Way
Yerington, NV 89447
Phone: 775-463-6645
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